

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
FLAVIA BENITEZ,)	
Plaintiff,)	
)	
v.)	Civil Action No: 04-CV-11959-NG
)	
SODEXHO MARRIOTT SERVICES,)	
Defendant.)	
_____)	

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1

The parties in the above-entitled action have timely conferred among themselves and hereby submit the following proposed schedule:

Proposed Discovery and Motion Schedule

The parties propose the following schedule for discovery and motions:

- A. The parties will exchange initial disclosures by May 30, 2005.
- B. Fact discovery to be completed by November 30, 2005.
- C. Summary judgment motions to be served and filed on or before December 30, 2005.
- D. Any opposition to a motion for summary judgment shall be served and filed no later than 30 days after the date of service of the motion to which it responds.
- E. Any party moving for summary judgment can file a reply to any opposition no later than ten days after the service of the opposition.
- F. Plaintiff to designate experts and serve expert reports 45 days after receipt of a decision by the Court denying any motion for summary judgment or February 15, 2006, whichever is later.
- G. Defendant to designate experts and serve expert reports 45 days after receipt of the plaintiff's expert designation or April 3, 2006, whichever is later.

- H. Expert discovery completed 30 days after receipt of the defendant's expert designations and service of expert reports or May 1, 2006, whichever is later.

Certifications

The defendant's Local Rule 16.1 Certification is attached hereto as Exhibit A. The plaintiff's Local Rule 16.1 Certification has been forwarded to the Court under a separate cover.

FLAVIA BENITEZ,
By her attorney,

SODEXHO, INC.,
by its attorneys,

/s/ Robert LeRoux Hernandez
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Dated: April 15, 2005

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EXHIBIT A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
FLAVIA BENITEZ,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO. 04-11959-NG
)	
SODEXHO MARRIOTT SERVICES,)	
)	
Defendant.)	
_____)	

CERTIFICATION PURSUANT TO LOCAL RULE 16.1(D)(3)

Sodexo, Inc., ("Sodexo") misnamed herein as Sodexo Marriott Services and its counsel submit the following certification in accordance with Local Rule 16.1(D):

1. Sodexo and its counsel hereby certify that they have conferred with a view to establishing a budget for the costs of conducting the full course, and various alternative courses, of this litigation;
2. Sodexo and its counsel also certify that they have conferred to consider the resolution of this litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Respectfully submitted,
SODEXHO, INC.,

/s/ David W. Hayes
David W. Hayes, Vice President
& Associate General Counsel
Sodexo, Inc.
45 Hayden Ave., P.O. Box 9196
Lexington, MA 02420
(781) 372-6000

and

/s/ Kenneth J. Martin

Harry L. Manion III, BBO #: 317440

Kenneth J. Martin, BBO #: 636643

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Dated: April 15, 2005